

UNITED STATES OF AMERICA  
FOR THE DISTRICT OF MASSACHUSETTSFILED  
IN CLERK'S OFFICE

MARY NOLAN	)
	)
Plaintiff,	)
	)
v.	)
	)
BLUE CROSS AND BLUE SHIELD	)
OF MASSACHUSETTS, INC.	)
	)
Defendant.	)

2004 JUN -3 A 11:46  
 U.S. DISTRICT COURT  
 DISTRICT OF MASS.  
 CIVIL ACTION  
 NO. 04-10944-RGS

**JOINT MOTION TO EXTEND PLAINTIFF'S TIME TO JUNE 19, 2004 THE DEADLINE TO FILE RESPONSE TO DEFENDANT'S MOTION TO DISMISS.**

NOW COMES the parties, by and through their legal counsel, and hereby request that this Honorable Court extend the Plaintiff's time to file response to the Defendant's Motion to Dismiss and Request for Hearing until June 19, 2004. As grounds therefore the Parties state as follows:

1. The parties are in the process of attempting to resolve this matter; and
2. Attorney for the Plaintiff, L. Richard LeClair, III, is on business in California and needs time to respond to the Defendant's motion.

WHEREFORE, the parties pray that the Court allow this motion to allow the Plaintiff until June 19, 2004 to answer the Defendant's motion.

Respectfully submitted,  
 By the Plaintiff,  
 Mary Nolan,  
 By her attorney,

L. Richard LeClair, III (BBO#561650)  
 LeClair & LeClair, P.C.  
 135 Beaver Street 2<sup>nd</sup> Floor  
 Waltham, MA 02452  
 Tel: (781)893-5655  
 Fax: (781)647-9346

Respectfully submitted,  
 By the Defendant,  
 Blue Cross and Blue Shield of  
 Massachusetts, Inc.  
 By its attorney,

Sara A. Walker, (BBO#552116)  
 Blue Cross and Blue Shield of  
 Massachusetts, Inc.  
 Landmark Center  
 401 Park Drive  
 Boston, MA 02215-3326  
 Tel: (617)246-3500  
 Fax: (617)246-3550

**CERTIFICATE OF SERVICE**

I hereby certify that on this day a true copy of the within document was served upon the attorney of record for each party by mail/

Dated: 6/2/04